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**EBASCO SERVICES INCORPORATED**

Two World Trade Center, New York, N.Y. 10048

**EBASCO**

January 20, 1987

Mr. Nigel Robinson
Remedial Project Manager
US Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

SUBJECT: ASBESTOS DUMP SITE
REVIEW OF SITE OPERATIONS
PLAN ADDENDUM
EPA WORK ASSIGNMENT NUMBER: 10-26A2
EPA CONTRACT NUMBER: 68-01-7250

Dear Mr. Robinson:

As you requested in your letter of January 14, 1987, Ebasco Services Incorporated (Ebasco) has reviewed the Addendum to Fred C. Hart Associates' Site Operations Plan. Ebasco's comments are attached. In summary, the Addendum lacks the detail to consider the adequacy of the Site Safety Plan.

Ebasco has completed the oversight of Hart's geophysical survey which was conducted during the week of January 12, 1987. Ebasco will resume oversight activities during the drum excavation work currently planned for the week of January 26, 1987.

If I can be of further assistance, please contact me at (201) 460-6509.

Very truly yours,

William Colvin

William Colvin
Site Manager

WC/ms
Attachment
cc: D Sachdev
B Groves
J Gabry

Ebasco Services Incorporated's (Ebasco) Comments on the Addendum to Fred C. Hart Associates' (Hart) Site Operations Plan for the Millington, Great Swamp, 257 New Vernon Road and White Bridge Road Site. December 15, 1986; Revised - January 7, 1987.

1. General

The Addendum lacks sufficient detail to consider the adequacy of the Site Safety Plan as requested by EPA.

2. Specific

a. Cover letter, second paragraph: Hart planned to begin the test pit operations on January 19, 1987. In a telephone conversation on January 19, 1987, between the Ebasco SM and the Hart Field Team Leader, the SM was informed that the date for beginning the test pit operations has been rescheduled for January 26, 1987. In a telephone conversation between the Ebasco SM and the EPA RPM on January 15, 1987 the SM requested the following information: a) the number of samples Hart proposes to collect; and b) the types of analyses to be performed. This information is needed in order for Ebasco to schedule the CLP analyses for the split samples. A potential problem exists as Ebasco will require, after receipt of this information, one week to prepare the SAS requests, if required. Additionally, the EPA RSCC will require three weeks after receipt of Ebasco's SAS requests to schedule the high concentration analyses. If a high priority cannot be set by EPA for the scheduling of these analyses, sample splitting cannot be conducted as scheduled. If the required analyses are scheduled by the RSCC prior to the sampling of the excavated drums, Ebasco will provide sample containers which will be filled by Hart or Hart's subcontractor. As directed by the RPM approximately fifty percent of all samples collected by Hart or Hart's subcontractor will be split with Ebasco.

b. Page 2, last paragraph, first sentence: The Ebasco SM and the EPA RPM have agreed that Ebasco personnel will not enter the excavation work area. Therefore, coordination with Ebasco representatives of the USEPA will have to be effected outside of the excavation work area. Ebasco cannot approve of the drums Hart chooses to sample. However, the coordination is necessary to document which drums were sampled and to select the drums from which the split samples will be obtained.

c. Page 2, last paragraph, first sentence and Attachment 1, Section D: The details of the drum removal and sampling procedures should be included in the Addendum.

d. Page 2, last paragraph, second sentence and Attachment 1, Section D: The drum recovery and overpack procedures should be delineated in the Addendum.

e. Page 2, last paragraph, third sentence: The SOP's for contaminant release contingencies should be included in the Addendum. These SOP's should address: 1) worker safety considerations and the required level of personnel protection during all phases of the operations; 2) the procedures for equipment decontamination; and 3) the monitoring procedures to be followed during all phases of the operations. A contingency plan should be developed for spills and releases during drum removal/recovery, overpacking, transportation, sampling, and storage. The plan should address the handling of soils which become contaminated by spills and releases both in the excavation work area and in the temporary storage area(s).